

**United States District Court**

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

GREGORY LAWRENCE,  
a/k/a "Frankie Lafontant,"  
a/k/a "Lee Ruben Charlemagne"

CASE NUMBER: 00-5038-LRJ

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 14, 2000 in Broward County, in the Southern District of Florida and elsewhere, defendant, (Track Statutory Language of Offense)

GREGORY LAWRENCE, did willfully and knowingly use or attempt to use passport No. 045826242, issued under the authority of the United States, the issuance of which was secured by reason of a false statement made in the application therefore which falsely stated that defendant's identity was "Lee Ruben Charlemagne, a United States Citizen," which said passport the defendant used or attempted to use to gain entry into the United States at Miami International Airport,

in violation of Title 18 United States Code, Sections 1542.

I further state that I am a Special Agent, U.S. Dept. of State and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached and made a part hereof:  Yes  No

FEB 18 2000  
FEB 18 AM 10:12  
CLERK'S OFFICE  
S.D. OF FLA - WPB

Signature of Complainant

Paul Mastando

Special Agent

United States Department of State

Diplomatic Security Service

Sworn to before me, and subscribed in my presence,  
the Court finds probable cause.

February 18, 2000  
Date

at West Palm Beach, Florida  
City and State

LINNEA R. JOHNSON, UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Paul Mastando, being duly sworn, hereby depose and say that:

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service, and have been so employed since November 2, 1998. Prior to this, I was a police officer and detective for the past four and a half years with the police department of City of Coral Springs, Florida. My current responsibilities include the investigation of violations of passport and visa laws.

2. The facts set forth below are based upon my personal observations, as well as information and documents provided to me in my official capacity. Because this affidavit is submitted for a limited purpose of showing probable cause for the criminal complaint, I have not included details of every aspect of this investigation.

3. On February 16, 2000, I was contacted in reference to a person who obtained entry into the United States on February 14, 2000, on U.S. Passport 045826230 in the name of Burt CHARLEMAGNE, date of birth January 16, 1975. "CHARLEMAGNE" was placed in secondary inspection and his fingerprints were obtained and submitted to the FBI Special Processing Unit for identification. Due to a delay in the fingerprint processing, "CHARLEMAGNE" was released. On February 16, 2000, I was advised that "CHARLEMAGNE's" fingerprints are actually listed with the FBI as those of Jack ROUCHON (FBI#619859XA2).

4. A subsequent criminal history check on Jack ROUCHON revealed an arrest history for narcotics trafficking and possession and listed ROUCHON as a previously deported felon. ROUCHON was listed as deported on 5/26/1999 to the Bahamas.

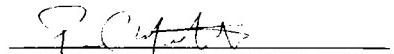
5. ROUCHON was traveling with another subject, Gregory LAWRENCE, a/k/a Frankie LAFONTANT, who was traveling on a fraudulently obtained U.S. Passport in the name of Lee Ruben CHARLEMAGNE. Gregory LAWRENCE is currently wanted by the Miami Dade Police Department for an active homicide warrant.

6. On February 16, 2000, I retrieved a copy of the DSP-11 Passport Application in the name of Burt CHARLEMAGNE and reviewed the document. On the application, which was executed on December 27, 1999, in Hollywood, Florida, the SUBJECT listed his true name as Burt CHARLEMAGNE, born on January 16, 1975, in Miami, Florida. The information on the DSP-11 is contrary to the SUBJECT's arrest history and the respective deportation.

7. Based on the foregoing, I believe that there is probable cause that on or about December 27, 1999, in the Southern District of Florida, Jack ROUCHON, a/k/a Burt CHARLEMAGNE willfully and knowingly obtained a United States Passport in Miami.

Florida, which was applied for by making false statements in an application for that United States Passport in violation Title 18, United States Code, Section 1542.

Further affiant sayeth naught.

  
PAUL MASTANDO, SPECIAL AGENT  
U.S. DEPARTMENT OF STATE

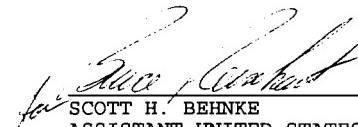
SWORN to and subscribed before  
me this 18 day of February, 2000.

  
LYNNEA R. JOHNSON  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA

BOND RECOMMENDATION

GREGORY LAWRENCE, a/k/a Frankie Lafontant, a/k/a Lee Ruben  
Charlemagne  
Defendant

Pre-Trial Detention is recommended as to defendant.

  
SCOTT H. BEHNKE

ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

Case No. 00-5038-LRJ

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY LAWRENCE,,  
a/k/a "Frankie Lafontant",  
a/k/a "Lee Ruben Charlemagne",

Defendant.

/

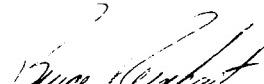
CRIMINAL COMPLAINT COVER SHEET

1. Did this case originate from a matter pending in the United States Attorney's Office prior to April 1, 1999?    Yes X No
2. Did this case originate from a matter pending in the Central Region of the United States Attorney's Office prior to April 1, 1999?    Yes X No

Respectfully submitted,

THOMAS E. SCOTT  
UNITED STATES ATTORNEY

BY:

  
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